

Richard W. Epstein, Esq. (admitted *Pro Hac Vice*)
Jeffrey Backman, Esq. (admitted *Pro Hac Vice*)
Michelle Durieux, Esq. (admitted *Pro Hac Vice*)
GREENSPOON MARDER LLP
200 East Broward Blvd., Ste. 1800
Fort Lauderdale, FL 33301
Tel: 954 491-1120
Facsimile: 954-343-5624
Richard.Epstein@gmlaw.com
Jeffrey.Backman@gmlaw.com
Michelle.Durieux@gmlaw.com

Phillip A. Silvestri, Esq.
Nevada Bar No. 11276
GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Ste. 400
Las Vegas, NV 89169
Tel: 702-978-4249
Fax: 954-333-4256
Phillip.Silvestri@gmlaw.com

Kimberly Maxson-Rushton
Nevada Bar No. 5065
Gregory Kraemer
COOPER LEVENSON, P.A.
3016 W. Charleston Blvd., #195
Las Vegas, NV 89102
T: (702) 366-1125
F: (702) 366-1857
krushton@cooperlevenson.com
gkraemer@cooperlevenson.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware Limited
Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
Limited Liability Company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual and
citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ORDER TO
EXTEND BRIEFING DEADLINE FOR
THIRD MOTION TO COMPEL [ECF
#424]**

[First Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”) and Defendant Reed Hein & Associates d/b/a/ Timeshare Exit Team (“Defendant”) hereby stipulate to extend the response and reply in support filing deadlines with respect to Plaintiff’s Motion to Compel [ECF #424] (the “Motion”). Plaintiff and Defendant are collectively referred to as the “Parties.”

1. Plaintiff filed the Motion on May 24, 2021.

2. Defendant’s current deadline to file its Response is June 7, 2021.

3. To adequately respond to Plaintiff’s Motion, and the issues presented therein, the Parties agree that Defendant’s deadline to file a response be extended **June 11, 2021**.

4. Further, to adequately address the issues Plaintiff anticipates will be presented in Defendant’s Response, the Parties agree that Plaintiff’s deadline to file its Reply in support of the Motion be extended two (2) weeks up to and including **July 2, 2021**.

5. This is the Parties’ first request for extension of these deadlines, and it is not intended to cause any delay or prejudice to any party.

Dated this 4th day of June, 2021.

GREENSPOON MARDER, LLP

**GORDON REES SCULLY
MANSUKHANI, LLP**

/s/ Phillip A. Silvestri

/s/ Dione C. Wrenn

PHILLIP A. SILVESTRI, ESQ.

ROBERT S. LARSEN, ESQ.

Nevada Bar No. 11276

Nevada Bar No. 7785

3993 Howard Hughes Parkway, Suite 400

DAVID T. GLUTH, II, ESQ.

Las Vegas, NV 89169

Nevada Bar No. 10596

Attorneys for Plaintiff

DIONE C. WRENN, ESQ.

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*Diamond Resorts U.S. Collection
Development, LLC*

Nevada Bar No. 13285
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101

*Attorneys for Defendants
Reed Hein & Associates, LLC dba Timeshare
Exit Team, Brandon Reed, Trevor Hein,
Thomas Parenteau, and Happy Hour Media
Group, LLC*

IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE

DATED: 6-7-2021